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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

In Re: Case No. 25-10088 WJL

Kingsborough Atlas Tree Surgery, Inc. Chapter 11

Debtor.

NOTICE OF CONDITIONAL
WITHDRAWAL OF MOTION FOR
AUTHORITY TO SELL PERSONAL
PROPERTY

Date: July 1, 2025
Time: 9:30 am
Ctroom: 1300 Clay Street, Room 220
Oakland, CA 94612
Video Conference

TO: COMMERCIAL CREDIT GROUP AND PARTIES IN INTEREST

NOTICE is hereby given that Kingsborough Atlas Tree Surgery, Inc. ("Debtor") hereby conditionally withdraws its motion for authority to sell six pieces of equipment to Davey Tree Expert Company (Dkt No, 97). If Anvil Builders, the only party to object to the sale, withdraws its objection and consents to the sale under 11 USC § 363(f), the motion will be heard at the continued hearing on July 1, 2025. However, if Anvil Builders continues to object, the motion will be withdrawn.

Dated: June 11, 2025

/s/ Michael C. Fallon
Michael C. Fallon
Attorney for Debtor